UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
No. 5:20-CV-00589-BO

TAMER ESCANDER,	*	
	*	
Plaintiff,	*	
	*	**PLAINTIFF'S CONSENT MOTION**
v.	*	**TO MODIFY SCHEDULING ORDER**
	*	
CHRISTINE WORMUTH,	*	
	*	
Defendant.	*	
	*	

*   *   *   *   *   *   *   *   *   *   *   *   *

NOW COMES Plaintiff Tamer Escander ("Escander") to respectfully request a

modification of the Court's 7 November 2022 Scheduling Order (Dkt. #64) extending his 15

November deadline by three weeks until 6 December and setting Defendant's subsequent

deadline 21 days after that, or 27 December. Defendant consents to this Motion.

Escander has good cause to request this relief. His undersigned counsel have been

encountering logistical difficulties communicating with some witnesses from whom they intend

to obtain sworn declarations, and last week his counsel Kel McClanahan was forced to engage in

a lengthy mediation process in a fact-intensive case which exacerbated the problems even

further.

Defendant consents to this Motion and respectfully requests that she continue to be

allowed 21 days to file her reply, to which Escander consents.

Date: November 15, 2022

Respectfully submitted,

/s/ Kelly B. McClanahan
Kelly B. McClanahan
National Security Counselors
4702 Levada Terrace
Rockville, MD 20853
301-728-5908
Kel@NationalSecurityLaw.org
DC Bar. No. 984704

Counsel for Plaintiff

/s/ Timothy Coffield
Timothy Coffield
Coffield PLC
106-F Melbourne Park Circle
Charlottesville, VA 29901
434-218-3133
Fax: 434-321-1636
tc@coffieldlaw.com
NC Bar. No. 51888

Local Civil Rule 83.1(d) Counsel for Plaintiff

2

CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of November, 2022, I filed the foregoing with the

Court's Electronic Case Filing system, causing a copy to be served via electronic mail on

Defendant's counsel of record.

Date: November 15, 2022

Respectfully submitted,

/s/ Kelly B. McClanahan
Kelly B. McClanahan
National Security Counselors
4702 Levada Terrace
Rockville, MD 20853
301-728-5908
Kel@NationalSecurityLaw.org
DC Bar. No. 984704

Counsel for Plaintiff